

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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IN RE:

RAYMOND WILLIAMS,  
  
Debtor.

CASE NO.: 07-32566-JDL  
  
Chapter 13

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**MOTION TO ALLOW FOR SUBSTITUTION OF COLLATERAL, OR IN THE  
ALTERNATIVE, TO DIRECT INSURANCE PROCEEDS TO BE  
PAID TO DIRECTLY TO THE DEBTOR, AND/OR TO DELETE VEHICLE AND  
VEHICLE PAYMENT FROM PLAN**

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COMES NOW Raymond Williams (the "Debtor"), by and through counsel, to  
move this Honorable Court in the following particulars:

1. Your debtor had a 1997 Ford F150 Truck included in the plan for payment.

The lien holder is Budget Auto Sales.

2. The debtor's vehicle was involved in an accident on or about February 12,  
2008. The debtor's vehicle was deemed a total loss by the insurance company.

3. Your debtor presently has no transportation.

4. Your debtor seeks to be allowed to use the insurance proceeds to substitute  
collateral. The debtor proposes to seek a substitution from the inventory held by Budget  
Auto Sales.

5. In the alternative, your debtor seeks to have the insurance proceeds to be paid  
directly to him, so he may obtain transportation.

6. In addition, and in the alternative, your debtor seeks to have the plan modified to delete the secured claim and payment for the lien holder, and the insurance charge from the plan, so that the payments may be reduced.

**WHEREFORE, PREMISES CONSIDERED, IT IS PRAYED:**

1. For a hearing on the above requests by the debtor;
2. For such further and other relief as to which the debtor may be entitled.

/s/ Ted I. Jones

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*Attorney for the Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 4th day of April, 2008, a copy of the foregoing electronically filed motion was served on the parties listed below by first-class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Budget Auto Sales  
David Drexler, Esq.  
Chapter 13 Trustee  
Priority Insurance

/s/ Ted I. Jones  
Ted I. Jones